REMARKS

Claims 1-3, 5-14, and 21-27 are currently pending in the application. Claims 1, 9 and 25 are independent. Applicants respectfully request reconsideration of the present application.

Rejection of Claims 1-3 and 7-8

Claims 1-3 and 7-8 stand rejected as being unpatentable over Singkornrat in view of Jung and further in view of Jaaskelainen. Applicant respectfully disagrees.

With respect to claim 1, claim 1 is patentable over Singkornrat in view of Jung and further in view of Jaaskelainen for two reasons.

First, none of the references disclose "a computer wireless transceiver [connected to a computer main unit]; a monitor wireless transceiver; a computer display device; [and] a display driver **coupled between** said computer display device and said monitor wireless transceiver, wherein said display driver is configured to translate data between the monitor wireless transceiver and the computer display device," as is required by claim 1 (emphasis added).

Applicant admits that Singkornrat discloses: a computer wireless transceiver (see Singkornrat figure 2 elements 106/112), a computer main unit (see Singkornrat figure 1 element 12), a monitor wireless transceiver (see Singkornrat figure 3 elements 116/124), a computer display device (see Singkornrat figure 1 element 24), and a display driver that is configured to convert data (see Singkornrat figure 2 element 102). However, applicant respectfully submits that Singkornrat does not teach or suggest, among other things, that the display driver 102 is "**coupled between** said computer display device and said monitor wireless transceiver," as is explicitly required by claim 1. Rather, Singkornrat teaches that the display driver 102 is coupled between the computer main unit 12 and the computer wireless transmitter 106. This is a significant distinction.

Neither Jung nor Jaaskelainen makes up for the deficient teachings of Singkornrat. Neither Jung nor Jaaskelainen teach or suggest a "monitor wireless transceiver," and, therefore, can not, by definition, teach or suggest a display driver coupled between a computer display device and a monitor wireless transceiver. Applicant admits that Jung

discloses a "radio transceiver" (see Jung at figure 1). However, the "radio transceiver" disclosed in Jung is not a "monitor wireless transceiver" because claim 1 explicitly requires that the "monitor wireless transceiver" "receive[s] data from and transmit[s] data to said computer main unit in a wireless manner" and the "radio transceiver" disclosed in Jung **does not** receive data from and transmit data to said computer main unit. Rather, the radio transceiver merely receives data wirelessly from and transmits data wirelessly to the wireless headphone unit. Accordingly, the "monitor wireless transceiver" of claim 1 **does not** read on the "radio transceiver" disclosed in Jung.

Accordingly, none of the references teach or suggest "a display driver **coupled between said computer display device and said monitor wireless transceiver**." Therefore, a *prima facie* case of obviousness can not be made because in order to make a *prima facie* case of obviousness the references must disclose all of the claimed elements. Applicant, therefore, respectfully requests that the rejection of claim1, and claims 2-3 and 7-8, which depend from claim 1, be withdrawn.

Second, there is no suggestion or motivation to combine the references. In order for the Office to establish a *prima facie* case of obviousness, there must be "some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings." MPEP §2143; see also In re Kahn, 441 F.3d 977, 986 (Fed. Cir. 2006) (noting that "mere identification in the prior art of each element is insufficient to defeat the patentability of the combined subject matter as a whole").

The Office contends, "it would have been obvious to ... incorporate the teachings of Jaaskelainen into ... Singkornrat and Jung in order to **convert the signal to RGB** video in order to display on the monitor." Office Action at page 9, emphasis added.

Applicant respectfully submits that there is no motivation or suggestion to convert the signal to RGB because, when the signal is output from the computer, the signal is **already** in RGB format. This is clearly shown in FIG. 2 of Singkornrat, which figure is reproduced below, and in FIG. 1 of Jung, which is also reproduced below.

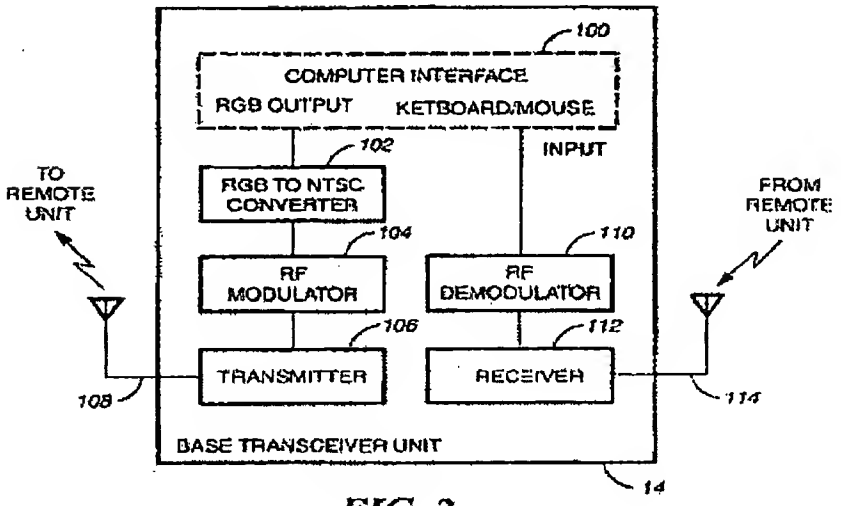
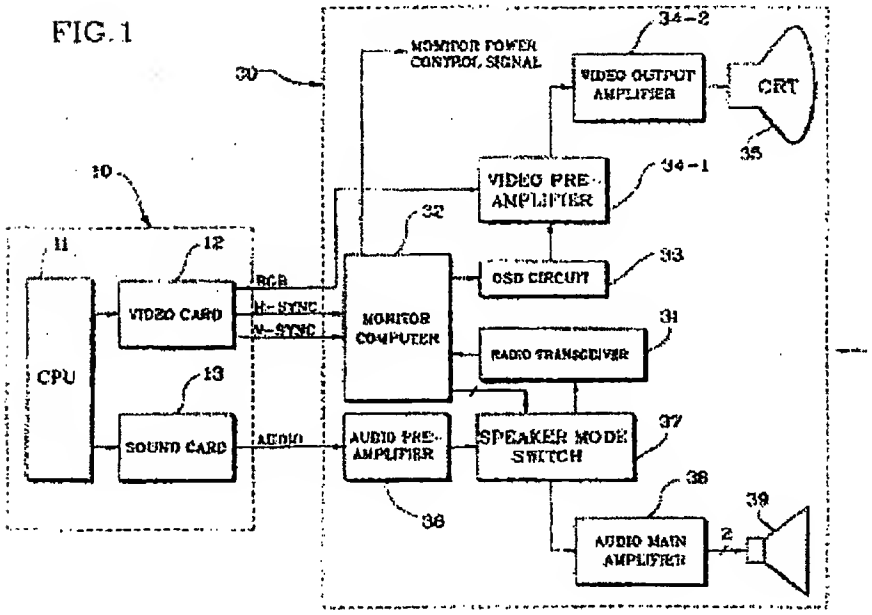


FIG. 2

Singkornrat FIG. 2

FIG. 1



JUNG FIG. 1

As illustrated in figure 2 of Singkornrat, the computer outputs an RGB signal to the base unit 14. The base unit 14 then converts the RGB signal to an NTSC signal. This NTSC signal is then modulated and transmitted to the remote unit 16. The remote unit 16 includes a receiver for receiving the signal transmitted from the base unit 14 and for demodulating the signal to recover the NTSC signal, which signal is then sent to the TV 24 via the switch box 118.

Similarly, as illustrated in figure 1 of Jung, Jung merely discloses a computer 10 connected to a monitor 30. The computer 10 includes a video card 12 that outputs an RGB signal to the monitor 30. The monitor 30 includes and OSD circuit 33 that output an RGB signal. The monitor 30 also includes a video pre-amplifier 34-1 and a video output amplifier 34-2, both of which function to amplify the RGB signal outputted from the video card 12 and OSD circuit 33. The output of the video output amplifier 34-2 is connected to an input of a CRT 35.

With respect to Singkornrat, there is simply no good reason for incorporating into the remote unit 16 a driver that is configured to translate to an RGB signal the NTSC signal extracted by receiver 116. If the display device that is coupled to the remote unit 16 requires an RGB signal (as opposed to an NTSC signal), then the most obvious, most cost effective, and simplest solution is to **not use** the RGB to NTSC converter in the base unit 14, as opposed to incorporating into the remote unit 16 a device to covert the signal back to RBG from NTSC. In fact, this obvious and simple solution is exactly what is taught by Singkornrat. Specifically, Singkornrat states, "[a]lternatively, the base unit [14] can include a modulator that modulates the carrier wave with RGB signals **without using the RGB to NTSC converter** 102. The remote receiver unit [16] would then be adapted to demodulate the received signals to extract RGB signals and a monitor having an RGB input could be used. This will result in a better resolution." Singkornrat at Col. 2, lines 34-40 (emphasis added). Singkornrat could not have been more clear. If one wants to use a monitor having an RGB input, as opposed to an NTSC input, then one would simply **not use the RGB to NTSC converter that is in the base unit 14**. Thus, contrary to the Office's assertion, there is simply no good or valid reason for including into the remote unit 16 a device for converting the NTSC signal to RGB. Similarly, with respect to Jung, there is simply no

good reason to modify the system in Jung to include a device that "convertes the signal to RGB" because Jung already has a device that performs the conversion (i.e., the video card and the OSD circuit).

Hence, it is not obvious to incorporate the teachings of Jaaskelainen into Singkornrat and Jung in order to "convert the signal to RGB video." For this additional reason, Applicant respectfully requests that the rejection of claim 1, and claims 2-3 and 7-8, which depend from claim 1, be withdrawn.

Rejection of Claim 9-11, 21-23

Claims 9-11, and 21-23 stand rejected as being obvious over Singkornrat in view of Hoffert (U.S. Patent. No. 6,590,572). Applicant respectfully disagrees.

With respect to claim 9, claim 9 is patentable over Singkornrat in view of Hoffert for two reasons.

First, neither Singkornrat nor Hoffert, considered alone or in combination, teach or suggest all of the elements of claim 9. The Office correctly states that Singkornrat "fails to teach a ... communication [that] includes data and [the] unique address [of the computer main unit]." The Office incorrectly contends, however, that Hoffert makes up for the deficient teachings of Singkornrat.

Hoffert does not teach or suggest a "communication [that] includes data and said unique address [of the computer main unit]," as is required by claim 9. Instead, Hoffert discloses a "monitor interface cable." Col. 2, lines 62-63. In support of its contention that Hoffert discloses a "communication [that] includes .. said unique address [of the computer main unit]," the Office cites to col. 6, lines 7-26, which is reproduced below for the convenience of the Examiner.

> In order for a software program, which in the preferred embodiment is a Unix driver, to send command data through the Video Buffer Card 74, the command data must be written to a particular memory address (e.g. 0X09000) from which it will be delivered to the display monitor. This address is called the monitor read-write address. As illustrated in FIG. 5, a lower byte associated to this memory location (hereinafter "monitor read-write byte") 250 is used to transmit and receive the command data. The memory controller and the video buffer controller cause data written into the monitor read-write byte 250 to be placed in the

> appropriate location in VRAM such that the monitor display interface will receive the data and transmit it to the display monitor over the monitor interface cable. Additionally, data received from the display monitor is read by one of CPUs from the same address base. If a second card is installed, as is possible in an alternative embodiment of the invention, the address is decoded through the memory controller 50 to support the two cards. Significantly, nowhere does the above portion of Hoffert (or any portion of Hoffer for that matter) teach or suggest a "**communication [that] includes ... said unique address [of the computer main unit]**." Rather, Hoffert merely disclose a particular memory address. But nowhere does Hoffert disclose a monitor sending a communication to a computer main unit, wherein the communication "includes data and said unique address [of the computer main unit]." For this reason alone, the rejection of claim 9, and claims 10-11 and 21-23, which depend from claim 9, should be withdrawn.

Second, there is no motivation or suggestion to combine Singkornrat with Hoffert. The Office states, "it would have been obvious ... to incorporate the teachings of Hoffert into view of [sic] Singkornrat **in order to exchange the data between the CPU and the monitor**." Office Action at page 12 (emphasis added). The Office's rationale for why it would be obvious to combine the references is erroneous because the system disclosed in Singkornrat is **fully capable** of exchanging data between the CPU and the monitor. Thus, there is no advantage to adding the teachings of Hoffert to Singkornrat. Accordingly, there is not motivation or suggestion to combine the references. For this additional reason the rejection of claim 9, and claims 10-11 and 21-23, which depend from claim 9, should be withdrawn.

Rejection of claims 25-26

Claims 25-26 stand rejected as being unpatentable over Riazi (U.S. Patent. No. 6,748,005) in view of Jung (U.S. Patent. No. 6,041,225) and further in view of Jaaskelainen (U.S. Patent. No. 5,963,191). Applicant respectfully disagrees.

In connection with the rejection of claim 25, the Office asserts that Jung discloses "data translation means coupled between said computer display and said monitor wireless transceiver." However, as discussed above in connection with claim 1, Jung does not disclose this feature. Rather, Jung discloses a radio transceiver that merely receives data

wirelessly from and transmits data wirelessly to the wireless headphone unit. Accordingly, Applicant respectfully requests that the rejections of claim 25 and claim 26, which depends from claim 25, be withdrawn.

Rejection of Claim 5-6

Claims 5-6 depend from claim 1, and, therefore, are patentable for at least the reason given above with respect to claim 1.

Rejection of Claims 12-13, 14 and 24

These claims depend from claim 9, and, therefore, are patentable for at least the reason given above with respect to claim 9.

Rejection of Claim 27

Claim 27 depends from claim 25, and, therefore, is patentable for at least the reason given above with respect to claim 25.

CONCLUSION

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider all presently outstanding objections and rejections, and that they be withdrawn. Applicant believes that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

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